ACCEPTED 03-20-00129-CV 52965536 THIRD COURT OF APPEALS AUSTIN, TEXAS 4/29/2021 3:35 PM JEFFREY D. KYLE CLERK

No. 03-20-00129-CV

IN THE THIRD COURT OF APPEALS3rd COURT OF APPEALS AUSTIN, TEXAS

4/29/2021 3:35:34 PM

JEFFREY D. KYLE

QATAR FOUNDATION FOR EDUCATION, SCIENCE AND COMMUNITY DEVELOPMENT,

Appellant,

v.

KEN PAXTON, TEXAS ATTORNEY GENERAL, AND ZACHOR LEGAL INSTITUTE,

Appellees.

On Appeal from the 200th Judicial District Court of Travis County, Texas Trial Court Cause No. D-1-GN-18-006240

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR REHEARING

RIGGS & RAY, P.C.

Jennifer S. Riggs State Bar No. 16922300 jriggs@r-alaw.com 506 West 14th Street, Suite A Austin, Texas 78701 T: (512) 457-9806

F: (512) 457-9066

GREENBERG TRAURIG, LLP

Dale Wainwright
State Bar No. 00000049
wainwrightd@gtlaw.com
Nicole Cordoba
State Bar No. 24106197
cordoban@gtlaw.com
300 West 6th Street, Suite 2050

Austin, Texas 78701 T: (512) 320-7200 F: (512) 320-7210

COUNSEL FOR ZACHOR LEGAL INSTITUTE

TO THE HONORABLE COURT OF APPEALS:

Pursuant to Texas Rules of Appellate Procedure 10.5(b) and 49.8 Appellee Zachor Legal Institute (Zachor) files this motion requesting an extension of time to file its Motion for Rehearing.

Zachor requests an extension of seven (7) days to file their motion for rehearing up to and including Friday, May 7, 2021. This is Zachor's first request for an extension of this deadline.

Zachor's lead appellate counsel, Dale Wainwright, has recently suffered the death of a very close family friend, which affects his entire family and will require travel out of the city. Zachor seeks an extension not for purposes of delay but for time to address this tragic demise and then adequate time to prepare a cogent motion that will assist the Court.

Additionally, the COVID-19 pandemic has created inconvenience and difficulties for doing business as usual. For counsel to prepare and properly consult with clients to finalize their motion for rehearing, Appellee requests an extension of the motion for rehearing deadline.

PRAYER

For these reasons, Appellee Zachor Legal Institute prays that the Court grant the Motion for Extension of Time to File Motion for Rehearing up to and including Friday, May 7, 2021.

Respectfully submitted,

RIGGS & RAY, P.C.

By: /s/ Jennifer S. Riggs
Jennifer S. Riggs
State Bar No. 16922300
jriggs@r-alaw.com
506 West 14th Street, Suite A
Austin, Texas 78701
T: (512) 457-9806
F: (512) 457-9066

GREENBERG TRAURIG, LLP

By: /s/ Dale Wainwright
Dale Wainwright
State Bar No. 00000049
wainwrightd@gtlaw.com
Nicole Cordoba
State Bar No. 24106197
cordoban@gtlaw.com
300 West 6th Street, Suite 2050
Austin, Texas 78701
T: (512) 320-7200

T: (512) 320-7200 F: (512) 320-7210

COUNSEL FOR APPELLEE ZACHOR LEGAL INSTITUTE

CERTIFICATE OF CONFERENCE

I certify that I communicated about this Motion for Extension of Time to File Motion for Rehearing with Hon. Wallace Jefferson, counsel for Appellant Qatar Foundation, who advised they are unopposed to the requested extension. I left a message for Kimberly Fuchs, counsel for Appellee, the Attorney General, to discuss the motion for extension; however, I time had not heard back from her as of the time of this filing.

/s/ Dale Wainwright
Dale Wainwright

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served on all counsel of record through the courts' electronic filing system on this 29th day of April, 2021 as follows:

D. Patrick Long
patrick.long@squirepb.com
SQUIRE PATTON BOGGS (US) LLP
2000 McKinney Ave., Suite 1700
Dallas, Texas 75201
T: (214) 758-1500
F: (214) 758-1550

Amanda D. Price amanda.price@squirepb.com SQUIRE PATTON BOGGS (US) LLP 600 Travis Street Houston, Texas 77002 T: (713) 546-5850

F: (713) 546-5830

Wallace B. Jefferson wjefferson@adjtlaw.com Anna M. Baker abaker@adjtlaw.com ALEXANDER DUBOSE & JEFFERSON LLP 515 Congress Avenue, Suite 2350 Austin, Texas 78701 T: (512) 482-9300 F: (512) 482-9303

Counsel for Appellant

Kimberly Fuchs
Kimberly.fuchs@oag.texas.gov
Office of the Attorney General
Open Records Litigation
P.O. Box 12548, Capitol Station
Austin, Texas 78711
T: (512) 475-4195
F: (512) 320-0167

Counsel for Appellee Ken Paxton, Texas Attorney General

/s/ Dale Wainwright
Dale Wainwright

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Thao Nguyen on behalf of Dale Wainwright Bar No. 49 nguyent@gtlaw.com Envelope ID: 52965536

Status as of 4/29/2021 3:55 PM CST

Associated Case Party: Qatar Foundation for Education, Science and Community Development

Name	BarNumber	Email	TimestampSubmitted	Status
Amanda DoddsPrice		amanda.price@squirepb.com	4/29/2021 3:35:34 PM	SENT
Anna M.Baker		abaker@adjtlaw.com	4/29/2021 3:35:34 PM	SENT
David P. Long	12515500	patrick.long@squirepb.com	4/29/2021 3:35:34 PM	SENT
Wallace B.Jefferson		wjefferson@adjtlaw.com	4/29/2021 3:35:34 PM	SENT

Associated Case Party: Ken Paxton, Texas Attorney General

Name	BarNumber	Email	TimestampSubmitted	Status
Kimberly L. Fuchs	24044140	Kimberly.Fuchs@oag.texas.gov	4/29/2021 3:35:34 PM	SENT

Associated Case Party: Zachor Legal Institute

Name	BarNumber	Email	TimestampSubmitted	Status
Jennifer Scott Riggs	16922300	jriggs@r-alaw.com	4/29/2021 3:35:34 PM	SENT
Dale Wainwright		wainwrightd@gtlaw.com	4/29/2021 3:35:34 PM	SENT
Nicole Cordoba		cordoban@gtlaw.com	4/29/2021 3:35:34 PM	SENT
Shama Husain		shussain@r-alaw.com	4/29/2021 3:35:34 PM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Sharon Murray		Sharon.Murray@oag.texas.gov	4/29/2021 3:35:34 PM	SENT
Dallas Admin		dallasadmin@adjtlaw.com	4/29/2021 3:35:34 PM	SENT
Cathi Trullender		ctrullender@adjtlaw.com	4/29/2021 3:35:34 PM	SENT